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Attorneys for Defendant PACIFIC GAS AND ELECTRIC
COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**PG&E'S RESPONSE TO REQUEST
FOR 2020 ANALYSIS**

Judge: Hon. William Alsup

1 Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this
2 response to the Court’s Request for 2020 Analysis in a similar format as the chart PG&E
3 provided the Court on March 29, 2021 for 2019. (Dkt. 1376; *see* Dkt. 1369-1.)

4 PG&E is producing as Exhibit A a similar chart that includes, for 2020, the
5 estimated impact that PG&E’s tree-overstrike and Priority 1 and Priority 2 proposals may have
6 had in expanding the scope of PSPS events under the models PG&E had in place in 2020. (*See*
7 Dkt. 1369 at 2-3.) PG&E reiterates that the figures included in the chart are approximations that
8 are based on several assumptions, but PG&E believes that they are directionally representative of
9 the impact that these differences in PSPS protocols could have had if applied in 2020.¹

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25 ¹ In particular, PG&E notes that the estimated impact if PG&E had considered Priority 1 and
26 Priority 2 trees in 2020 (as estimated in Exhibit A) assumes that in 2020, PG&E would not have
27 mitigated outstanding Priority 1 or Priority 2 trees prior to the de-energization event. As
28 described during the March 23 hearing, when PG&E implements the proposal regarding
Priority 1 and Priority 2 trees this year, it intends to mitigate some or all outstanding Priority 1
and Priority 2 trees to help avoid the de-energizations that would be triggered by such trees.

1 Dated: April 16, 2021

Respectfully Submitted,

2 JENNER & BLOCK LLP

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4 By: /s/ Reid J. Schar
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